

Exhibit B



**NAVAJO NATION DEPARTMENT OF JUSTICE
OFFICE OF THE ATTORNEY GENERAL**

HARRISON TSOSIE
Attorney General

DANA BOBROFF
Deputy Attorney General

SENT VIA CERTIFIED MAIL - RETURN RECEIPT REQUESTED

June 30, 2011

Mr. Glen T. Senk
Chief Executive Officer
Urban Outfitters Incorporated
5000 South Broad Street
Philadelphia, Pennsylvania 19112-1495

RE: Cease and Desist Marketing Products Using "Navajo"

Dear Mr. Senk:

Please immediately cease and desist using the "Navajo" name on, and in relation to your products. The Navajo Nation ("Nation") is aware that your corporation is marketing and selling clothing and accessories using the Navajo name and trademark.¹ The Nation cannot accept its unique and well-known name being displayed on and in relation to your products, which have absolutely no connection to the Nation, its entities, its people, and their products. Your company's use of the Navajo name damages the Nation's government and commercial entities.

The Navajo name and trademark are famous. The Nation's name is the symbol of a sovereign entity in all of its governmental and commercial forms. The Nation and its people have used the Navajo formative name and Navajo trademarks in commerce for over 150 years with a wide variety of goods and services. The Nation's use of the Navajo name and trademarks has created a notable legacy and distinct association between the Nation, its entities, its people, and their products.

The Navajo name and trademarks have an unmistakable contemporary presence in the market. Furthermore, the Navajo name and trademark have widespread secondary meaning in the marketplace. The Nation and its entities have made substantial investments in advertising and promoting Navajo goods and services under the Navajo name and trademarks. The Nation has extensively used, advertised, promoted, offered, rendered and sold its goods and services to consumers through various channels of trade in commerce including national online and print media. The Navajo name and trademarks are prominently featured on the Nation's website, www.navajo.org, and throughout major media. Furthermore, the Navajo name and trademarks, and the products and services associated with therewith, have received a significant amount of unsolicited press coverage, and have been the subject of numerous television broadcasts and articles in major publications. As a result of the Nation's historical legacy, contemporary efforts, and concomitant results, the Navajo name and trademarks have become assets of substantial value and symbols of the Nation's and its entities' goodwill.

¹ See the following address for examples of your corporation's use of the Navajo name and mark to market and your products:
<http://www.urbanoutfitters.com/urban/search/search.jsp?searchPhrase=navajo&listViewSize=&indexStart=0&sortBy=&sortOrder=&categories=&categories2=&categories3=&categories4=&skuColor=&priceLow=&priceHigh=&skuSize=&bran&c=&maxPrice=&minPrice>

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The Nation and its entities own the famous and distinctive Navajo name and trademarks, which associate products and services solely with the Nation, its instrumentalities, and its agents. The Nation and its entities have numerous federal registrations for the Navajo trademarks, and applications for those federal registrations were filed as early as 1996. Furthermore, the Nation's entities (e.g., Navajo Nation Gaming Enterprise, Dine' Development Corporation, Navajo Arts & Crafts Enterprise) own numerous federal registrations incorporating the Navajo component. These registered marks are conclusive evidence of Nation's exclusive right to use the Navajo name and trademarks in connection with the specified goods and services. Demonstrative registrations include:

<u>Registration</u>	<u>Mark</u>	<u>Use</u>
2061748	NAVAJO	Sportswear; namely, slacks, shorts, skirts and jeans.
2237848	NAVAJO	Clothing; namely, tops, vests, shirts, sport shorts, polo shirts, golf shirts, * jackets, * T-shirts and sweat shirts.
2573987	NAVAJO	Towels, wash cloths, bath linens, fabric bath mats, bed sheets, pillow cases and bed linens.
2976666	NAVAJO	Footwear; namely, shoes and boots; beachwear, blouses, overalls, rain wear, sweaters, jackets, coats, ski wear, caps, visors, berets and hats.
3602907	NAVAJO	Online retail store services; namely, on-line ordering services in the field of clothing—specifically, men's and women's sportswear, namely, jeans, tops, shirts, sport shorts, polo shirts, golf shirts, T-shirts and sweatshirts.
3789271	FIREROCK NAVAJO CASINO 	Clothing; namely, shirts, sweatshirts and jackets; headwear.
3960633	NAVAJO	Tobacco pouches manufactured by the Navajo Nation or its individual members and sold within the Navajo Nation through Navajo Nation retail outlets.
3548345	NAVAJO	Paintings and drawings.
3548344	NAVAJO	Hand-spun yarn for textile use.
3787518	NAVAJO	Neckties and leather belts of plain leather, and of leather ornamented with silver, and of leather ornamented with silver and turquoise or other trimmings, for personal wear.
3787517	NAVAJO	Hand-woven blankets, namely woolen blankets, bed blankets, children's blankets, blanket throws.

Your corporation's use of the Navajo name and trademarks falsely suggests a connection with the Nation as an institution. The Nation is a federally-acknowledged Indian tribe, which is an institution as defined in Section 2(a) of the Trademark Act. The term "Navajo" points uniquely and unmistakably to the Navajo Nation. The fame or reputation of the Nation is such that when a corporation uses "Navajo" with its goods or services, a connection with the Nation is falsely presumed.

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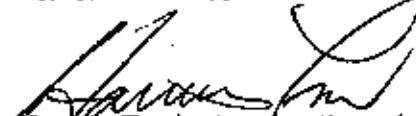
Although your corporation's use of the Navajo name and trademark falsely suggests a connection with the Navajo Nation, your corporation is not connected with the Nation's goods or services. Your corporation's use of "Navajo" is identical in appearance, meaning, and commercial impression to the Nation's name and trademarks. Thus, this falsely suggests a connection with the Nation in violation of the Trademark Act.

Your corporation's use of Navajo will cause confusion in the market and society concerning the source or origin of your corporation's products. Consumers will incorrectly believe that the Nation has licensed, approved, or authorized your corporation's use of the Navajo name and trademarks for its products - when the Nation has not - or that your corporation's use of Navajo is an extension of the Nation's family of trademarks - which it is not. This is bound to cause confusion, mistake, or deception with respect to the source or origin of your goods. This undermines the character and uniqueness of the Nation's long-standing distinctive Navajo name and trademarks, which—because of its false connection with the Nation—dilutes and tarnishes the name and trademarks. Accordingly, please immediately cease and desist using the Navajo name and trademark with your products.

As a Nation with a distinguished legacy and unmistakable contemporary presence, the Nation is committed to retaining this distinction and preventing inaccuracy and confusion in society and the market. The Nation must maintain distinctiveness and clarity of valid association with its government, its institutions, its entities, its people, and their products in commerce. When an entity attempts to falsely associate its products with the Nation and its products, the Nation does not regard this as benign or trivial. The Nation remains firmly committed to the cancellation of all marks that attempt to falsely associate with the institution, its entities, its people or its products. Accordingly, immediately cease and desist using Navajo with your products.

Respectfully yours,

NAVAJO NATION DEPARTMENT OF JUSTICE



Harrison Tsosie, Attorney General
Office of the Attorney General

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